Case 21-30589-MBK Doc 2957-2 Filed 08/31/22 Entered 08/31/22 16:53:24 Desc Exhibit A-Statement of Time and Expense Page 1 of 11

**EXHIBIT "A"** 



MILLER THOMSON LLP SCOTIA PLAZA 40 KING STREET WEST, SUITE 5800 P.O. BOX 1011 TORONTO, ON M5H 3S1 CANADA **T** 416.595.8500 **F** 416.595.8695

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## **Account Summary and Remittance Form**

August 31, 2022

Invoice Number 3787415

Official Committee of Talc Claimants c/o Brown Rudnick LLP Seven Times Square New York, NY 10036 United States

Attention: David Molton, Counselor at Law

Re: Johnson & Johnson - Talc Litigation

Our File No. 0265758.0001

Fees: \$67,857.50

Ontario HST 13% (R119440766) \$8,821.48

Total Amount Due \$76,678.98



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August 31, 2022

Invoice Number 3787415

Official Committee of Talc Claimants c/o Brown Rudnick LLP Seven Times Square New York, NY 10036 United States

Attention: David Molton, Counselor at Law

To Professional Services Rendered in connection with the following matter(s) including:

Re: Johnson & Johnson - Talc Litigation Our File No. 0265758.0001

Date	Initials	Description	Hours
07/01/2022	GF	Review appeal brief;	1.00
07/01/2022	GF	Review brief from Canadian class action representative;	0.60
07/01/2022	JCC	Correspondence with David Molton / Melanie Cyganowski/ Michelle Parfit/ Matt Diaz / regarding automatic stat and preliminary injunction;	0.60
07/04/2022	KN	Correspondence with A Iqbal regarding research findings of s 61 of the CCAA;	0.20
07/04/2022	Al	Call with G. Finlayson re Canadian recognition issues;	0.20
07/04/2022	GF	Confer with A Iqbal re memo on Canadian legal issues relevant to case;	0.20
07/05/2022	EY	Draft Research memo re: Just Energy Group Inc. et. al. v. Morgan Stanley Capital Group Inc. et. al., for A. Iqbal;	2.40
07/05/2022	GF	Prepare for call with TCC client representatives re mediation and case update;	0.80
07/05/2022	GF	Review document from TCC regarding Frederick complaint;	0.70



Date	Initials	Description	Hours
07/05/2022	Al	Email to M. Faheim with instructions on update to committee on Canadian case law;	0.10
07/05/2022	AI	Review emails from Committee Counsel and Committee Members re: Frederik Complaint	0.20
07/05/2022	JCC	Correspondence with Melanie Cyganowski regarding Mediation;	0.20
07/05/2022	JCC	Attend Update Committee Call;	0.80
07/05/2022	Al	Review Agenda in preparation for upcoming hearing;	0.10
07/05/2022	GF	Attend call with TCC client representatives re mediation and case update;	0.80
07/06/2022	MF	Review decision and memorandum re: Valuation and Voting of Class Action Plaintiffs in Just Energy Case prepared by student;	0.80
07/06/2022	Al	Attend July 6 hearing;	0.80
07/06/2022	MF	Revise summary email for A. Iqbal for committee counsel re Just Energy;	0.40
07/06/2022	AI	Finalize draft email to Committee re Canadian case law on valuation of claims;	0.40
07/06/2022	AI	Prepare for conference call with committee re debrief on hearing and other matters;	0.50
07/06/2022	GF	Attend at July 6th Chapter 11 hearing re continued mediation, estimation;	0.80
07/06/2022	GF	Attend at weekly TCC representatives call;	1.00
07/06/2022	GF	Communications with A Iqbal re estimation issues, appointment of valuation expert and need for Canadian expert;	0.20
07/06/2022	JCC	Attend hearing before Justice Kaplan;	0.80
07/06/2022	JCC	Attend Committee meeting;	1.00
07/06/2022	MF	Draft summary email for A. Iqbal for Committee and correspondence re Just Energy Case and Voting of Class Action Plaintiffs;	0.20
07/06/2022	Al	Call with G. Finlayson re debrief;	0.30
07/06/2022	Al	Attend conference call with committee re debrief on	0.50



Date	Initials	Description	Hours
		hearing and other matters;	
07/07/2022	GF	Emails with D Molton and representatives re mediation session;	0.10
07/07/2022	GF	Review email from A Iqbal re Just Energy CCAA case and treatment of mass torts and class actions in Canadian context;	0.20
07/07/2022	GF	Emails with D Molton and TCC re dismissal of fraudulent transfer claim in DBMP case;	0.30
07/07/2022	MF	Correspondence with A. Filazzola and with J. Carhart and MT internal team re: various matters pertaining to invoices and review of same;	0.80
07/07/2022	Al	Review emails from Committee counsel re meeting about mediation;	0.10
07/07/2022	Al	Attend conference call with Committee re: case strategy;	2.20
07/07/2022	GF	Review Amicus Curai on mass tort claims;	0.50
07/07/2022	JCC	Correspondence with David Molton / Daniel Stolz/ Susan Sieger-Grimm regarding meeting with Mediators;	0.30
07/07/2022	JCC	Correspondence with Asim Iqbal and Committee re Canadian considerations;	0.40
07/07/2022	JCC	Attend Committee meeting to discuss mediation;	2.20
07/08/2022	GF	Review estimation statement;	0.60
07/08/2022	GF	Review Addendum to Brief of the American Association for Justice;	0.40
07/08/2022	JCC	Update call with David Molton and Melanie Cyganowski regarding mediation;	0.80
07/08/2022	Al	Participate in conference call with Committee re: update on new developments in case;	1.10
07/10/2022	Al	Email exchange with D. Molton re: Canadian recognition principles;	0.20
07/10/2022	MF	Call with A. Iqbal re: memo for mediators;	0.20
07/10/2022	AI	Call with M. Faheim to provide instructions for preparation of memoranda;	0.20



Date	Initials	Description	Hours
07/10/2022	MF	Brief review of research from students;	0.10
07/11/2022	Al	Review email correspondence from D. Molton and other Committee members re: case strategy;	0.30
07/11/2022	GF	Emails with D Molton and other members of TCC re various issues in case including appeal briefing;	0.60
07/11/2022	JCC	Correspondence with Jerry Block/ Joe Satterley/ David Molton / Chris Tisi / Steve Kazan regarding appeal and July 26 hearing;	1.20
07/11/2022	JCC	Correspondence with Adam Silverstein/ David Molton/ Dan Stolz/ Melanie Cyganowski/ Lisa Busch/ Eric Karst / Len Parkins regarding case studios	0.70
07/12/2022	MF	Review correspondence re recognition of foreign orders;	0.80
07/12/2022	Al	Review correspondence among committee and committee members re: mediation and next steps;	0.20
07/12/2022	GF	Review emails from TCC re appeal and termination of mediation;	0.40
07/12/2022	MF	Initial research for memo for mediators re recognition of foreign orders / court approval;	0.80
07/12/2022	GF	Review materials from TCC re appeal and termination of mediation;	0.40
07/13/2022	MF	Review cases and table of case summaries re recognition of foreign orders;	0.80
07/13/2022	Al	Email from Brown Rudnick re filing deadlines for upcoming motions;	0.10
07/13/2022	MF	Draft memo for A. Iqbal for mediators re recognition of foreign orders / court approval and summary of case research;	1.80
07/13/2022	Al	Conference call with committee counsel re case strategy and updates;	0.80
07/13/2022	Al	Prepare for conference call with committee members and counsel;	1.10
07/13/2022	GF	Emails with TCC re weekly update call, mediation and other matters;	0.70

Date	Initials	Description	Hours
07/13/2022	JCC	Attend Counsel Pre-call;	0.80
07/13/2022	JCC	Attend Committee Meeting;	1.20
07/13/2022	Al	Attend conference call with committee members and counsel;	1.10
07/14/2022	GF	Review brief in response to New Jersey Coverage Action Plaintiffs' motions to lift the automatic stay;	0.40
07/14/2022	Al	Review and comment on memorandum re: Canadian recognition principles;	0.50
07/14/2022	GF	Emails with TCC re litigation issues;	0.30
07/14/2022	GF	Review memo from M Faheim on Canadian CCAA discretion of judge to approve US Chapter 11 proceeding outcome;	0.20
07/15/2022	GF	Review discovery letter;	0.10
07/15/2022	GF	Review debtor brief re adversary proceeding re New Mexico;	1.00
07/15/2022	GF	Review briefing materials from debtor for PI against New Mexico etc.;	0.70
07/15/2022	GF	Review Letter to Judge Kaplan from the TCC Regarding Discovery Issues;	0.50
07/15/2022	GF	Review Travelers' Limited Objection and Reservation of Rights Regarding Estimation Proceedings and Bellwether Trials;	0.50
07/16/2022	GF	Emails with TCC re media reporting and court materials;	0.30
07/17/2022	Al	Review emails from Committee Counsel re updates on various case matters;	0.30
07/18/2022	GF	Review emails from TCC re various issues;	0.70
07/18/2022	GF	Review letter from Third circuit;	0.20
07/18/2022	JCC	Correspondence with Susan Sieger-Grimm / Dan Stolz/ Thomas Bennett regarding Chapter 11 procedural issues;	0.40
07/18/2022	JCC	Correspondence with David Molton/ Dan Stolz / Jonathan Massey/ Jerry Block regarding appeal;	0.40



Date	Initials	Description	Hours
07/18/2022	GF	Discussion re letter from Third circuit;	0.10
07/19/2022	AI	Review and comment on memo for mediation re: Canadian law;	1.40
07/19/2022	GF	Review multiple emails from TCC regarding appeal and other issues;	0.30
07/19/2022	GF	Review court filed documents including Reply In Further Support Of The Official Committee Of Talc Claimants' Statement Requesting Modification Of The PI Order;	1.00
07/19/2022	JCC	Correspondence with Jennifer Feeney/ Joseph Satterley/ Susan Sieger-Grimm regarding Permanent Injunction;	0.80
07/20/2022	MF	Draft Memo re: recognition of foreign orders;	2.10
07/20/2022	GF	Emails with D Molton and TCC;	0.20
07/20/2022	Al	Weekly Committee Counsel conference call;	0.80
07/20/2022	Al	Participate in weekly committee call;	1.10
07/20/2022	JCC	Attend Counsel Pre-Call meeting;	0.80
07/20/2022	JCC	Attend Representative Counsel Call;	1.10
07/21/2022	Al	Consider documents in connection with case strategy from a Canadian perspective;	2.50
07/21/2022	GF	Review emails and documents from OC sub-group re mediation;	0.70
07/21/2022	GF	Review note from J Carhart to TCC counsel re Canadian legal issues and edit same;	0.20
07/21/2022	JCC	Draft correspondence to Gerard Cicero and Susan Sieger-Grimm regarding LTL;	0.40
07/22/2022	Al	Attend conference call with Committee re: case strategy;	1.10
07/22/2022	Al	Review documents in preparation for weekly committee meeting;	0.60
07/22/2022	JCC	Committee Call regarding Mediation;	1.10
07/22/2022	JCC	Correspondence with David Molton/ Joe Satterley/ Gerard Cicero regarding appeal;	0.40



Date	Initials	Description	Hours
07/22/2022	Al	Consider Canadian legal issues;	0.50
07/23/2022	JCC	Correspondence with David Molton/ Michelle Parfitt/ Mark Robinson/ Chris Tisi / Daniel Stolz / Steve Kazan / Melanie Cyganowski and Eric Goodman regarding LTL reply concerning Estimation Statements;	1.20
07/24/2022	GF	Review emails from TCC re filings and hearing July 26th;	0.60
07/24/2022	AI	Review emails from Committee Counsel re: certain appeal matters;	0.40
07/24/2022	JCC	Correspondence with Dan Stolz / Eric Goodman/ David Molton/ Gerard Cicero/ Leigh O'Dell / Susan Sieger-Grimm regarding Response concerning Estimation issues;	0.80
07/25/2022	AI	Review correspondence and attachments from Committee re: materials for estimation hearing;	1.20
07/25/2022	MF	Revisions to LTL trust distribution procedures;	1.00
07/25/2022	Al	Meeting with P. Sawicki re: case research needs;	0.70
07/25/2022	Al	Review agenda for July 26 hearing;	0.20
07/25/2022	Al	Participate in conference call with Committee re July 26 hearing;	0.60
07/25/2022	GF	Prepare for pre-hearing meeting of TCC;	0.30
07/25/2022	AI	Review TCC response to late filed submission of Debtor in estimation motion;	0.90
07/25/2022	Al	Further revisions to documents circulated by E. Goodman and email to E. Goodman re same;	0.30
07/25/2022	Al	Review emails from Committee members re mediation;	0.30
07/25/2022	GF	Review reply pleading on estimation and consider;	0.60
07/25/2022	GF	Review comments from A Iqbal on trust distribution procedures;	0.40
07/25/2022	JCC	Committee call re July 26th hearing in New Jersey;	0.70
07/25/2022	Al	Prepare for pre-hearing conference call;	0.10
07/25/2022	GF	Attend pre-hearing meeting of TCC;	0.30

Date	Initials	Description	Hours
07/26/2022	GF	Review email from TCC re analogous 3M Chapter 11 two step filing and application to instant case;	0.10
07/26/2022	Al	Review monthly fee statement and comment on same;	0.10
07/26/2022	Al	Review materials in preparation for court hearing;	1.60
07/26/2022	Al	Revise memo re: Canadian recognition principles;	1.10
07/26/2022	Al	Attend second half of July 26 hearing;	3.00
07/26/2022	MF	Review fee application and correspondence re changes;	0.30
07/26/2022	JCC	Correspondence with Asim Iqbal and Eric Goodman regarding LTL;	0.20
07/26/2022	JCC	Attend hearing before Justice Kaplan regarding Estimation and Insurance related issues;	2.40
07/26/2022	Al	Virtually attend first half of July 26 hearing in NJ Bankruptcy Court;	1.60
07/27/2022	GF	Review transcript of hearing provided by TCC re appeal materials;	0.70
07/27/2022	JCC	Correspondence with David Molton / Jonathan Massey/ Chris Tisi/ Jeffrey Lamken / Melanie Cyganowski/ Joseph Satterley/ Gerard Cicero / Daniel Stoltz/ Perry Weitz / Saul Burian / Michelle Parfitt regarding hearings before Justice Rogers and Justice Kaplan;	1.20
07/28/2022	GF	Participate in TCC representative call post-decision;	0.50
07/28/2022	GF	Attend at decision on estimation and lift stay;	0.80
07/28/2022	GF	Participate in weekly TCC only call re court decision and next steps;	0.50
07/28/2022	JCC	Attend hearing before Justice Kaplan regarding decisions concerning path forward for LTL case;	0.80
07/28/2022	JCC	Attend counsel only call regarding decisions of Justice Kaplan;	0.50
07/28/2022	JCC	Attend Committee Representative and Member meeting;	0.90
07/28/2022	Al	Email exchanges with committee members regarding	0.60

E.&O.E.

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Date		Initials	<b>Description</b> status of hearing;			Hours	
07/28/20	022	Al	Attend ruling on July 28;	of Court on Esti	imation and ot	her matters	1.40
07/28/20	022	Al		Attend conference call with Committee re: court's decision and next steps;			
07/28/20	)22	GF	Emails re pre	ess release;			0.30
07/31/20	)22	JCC	•	Correspondence with David Molton/ Liz Carter/ Michelle Parfitt regarding discussion with Ken Fineberg;			0.20
		Total Ho	urs				96.50
Our Fee	<b>)</b> :						67,857.50
<b>TK ID</b> 01177 09210 01208 00615 09205 02853	Initials AI EY GF JCC KN MF	A. Iqbal E. Yeung G. Finlayson		Title Partner Student Partner Partner Student Associate	Rate \$625.00 \$200.00 \$873.25 \$835.00 \$200.00 \$395.00	Hours 35.70 2.40 22.80 25.30 0.20 10.10	Amount \$22,312.50 \$480.00 \$19,910.00 \$21,125.50 \$40.00 \$3,989.50
Ontario HST 13% (R119440766) On Fees					\$8,821.48		
Total Amount Due				\$76,678.98			